

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:20 CR 626 CDP SPM
)	
MARK A. BENNETT,)	
)	
Defendant.)	

**MEMORANDUM OF UNITED STATES IN SUPPORT OF
MOTION FOR PRETRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its Attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Jillian S. Anderson, Assistant United States Attorney for said District, and files this memorandum in support of its motion to detain the defendant pending trial, pursuant to Title 18, United States Code, §3141, et seq. The Government asserts:

1. There is a presumption, based upon the defendant's present charge, that no conditions of bond can ensure the community's safety. Defendant is charged with Production of Child Pornography, Title 18, United States Code, Section 2251(a). Title 18, U.S.C. Section 3142(e)(3) states that:

Subject to rebuttal by the person, it shall be presumed that no condition or combination of conditions will reasonably assure the appearance of the person as required and the safety of the community if the judicial officer finds that there is probable cause to believe that the person committed... an offense involving a minor victim under section . . . 2251

2. An joint investigation by the Federal Bureau of Investigation, the Missouri Internet Crimes Against Children Task Force and the St. Louis County Police Department's Special Investigation's Unit revealed that the defendant was in possession of over seven hundred and fifty (750) images and videos of child pornography involving prepubescent children who appear to be under the age of twelve years subjected to sexual activity and/or the lascivious display of their genitals. In addition, thousands of images of child erotica were located on the defendant's electronics. Moreover, the investigation uncovered numerous images of child pornography produced by the defendant depicting the defendant's sexual abuse of a child who was sexually abused by the defendant from the age of eight to thirteen years. During the years he was sexually abusing the victim, the defendant was employed as a school security officer by the Ferguson-Florissant School District (the defendant was not a law enforcement officer and had no affiliation with any police department). The defendant's school security officer uniforms are depicted in images he produced of his sexual abuse of the minor victim.

3. The nature and circumstances of the defendant's offense indicate a prurient interest in sexually abusing children. The nature and seriousness of the danger to children in our community posed by the defendant's release is a concern to the Government. For all of the aforementioned factors, and per Title 18, United States Code, Section 3142(g), the defendant cannot show that there is any condition or combination of conditions that will assure the safety of children in the community.

WHEREFORE, the Government respectfully requests that the Court order the defendant to be detained pending trial.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of this document was filed with the Court's electronic file management system for service upon all parties and counsel of record on October 8, 2020.

s/ Jillian S. Anderson
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